

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)	
)	
Petition Pursuant to 47 U.S.C. § 160)	WT Docket No. 01-184
For Partial Forbearance From the)	
Commercial Mobile Radio Services)	
Number Portability Obligation)	

REPLY COMMENTS OF NEUSTAR, INC.

NeuStar, Inc. ("NeuStar"), in its role as the neutral third party Local Number Portability Administrator ("LNPA") and operator of the Number Portability Administration Center ("NPAC"), submits its reply comments regarding the NPAC's readiness to implement wireless number porting and pooling by the November 24, 2002 deadline. On July 26, 2001, Verizon Wireless filed a petition with the Federal Communications Commission ("Commission") requesting permanent forbearance from the Commission's wireless local number portability requirement.¹ As a neutral third party administrator, NeuStar does not comment on the merits of Verizon Wireless' Petition, but addresses concerns raised by commenters in the above-captioned proceeding regarding the ability of the NPAC to accommodate increased traffic resulting from the implementation of wireless number portability and pooling simultaneously. The instant reply comments highlight the investments NeuStar has made and the steps NeuStar is undertaking to ensure a smooth and timely implementation of wireless pooling and portability, consistent with our regulatory obligations.

¹ *Verizon Wireless' Petition Pursuant to 47 U.S.C. §160 for Partial Forbearance from the Commercial Mobile Radio Services Number Portability Obligation*, WT Docket No. 01-184 (filed July 26, 2001) ("Petition").

The NPAC Can Accommodate the Simultaneous Implementation of Wireless Porting and Pooling by November 2002

NeuStar is committed to meeting the FCC's wireless number portability requirements. NeuStar is in the process of installing millions of dollars worth of hardware and software upgrades to the NPAC to meet the requirements of the mandate for wireless pooling and porting beginning November 24, 2002. Some commenters expressed concern that the NPAC may not be able to handle increased volumes of ports required by wireless number porting and pooling.² One commenter suggested that wireless porting volumes may reach up to 2.8 million a month.³ In anticipation of increased volumes, the planned NPAC upgrades will increase the current throughput volumes by 400 percent, two times the most aggressive volume increase projections, including wireline ports, submitted by industry commenters. The hardware upgrade installation will be completed and tested by May 2002. NeuStar also will deploy a software upgrade, version 3.1, beginning December 2001 with the Northeast Region. The last of the seven regions is scheduled to complete testing of 3.1 by May 2002. It is NeuStar's expectation that the NPAC software upgrades will be completed with ample time for wireless carriers to test and deploy wireless number portability and pooling consistent with the Commission's requirements.

Release 3.0 and the Benefits of Efficient Data Representation

Software version 3.1 includes Efficient Data Representation ("EDR"), a program that allows a large number of records to be stored as a single entry. For example, 3.1

² Comments of ALLTEL Communications, Inc. ("ALLTEL") at 4; AT&T Wireless Services, Inc. ("AWS") at 10, 17-18.

³ AWS Comments at 17-18.

allows a thousand-block of numbers to be stored as a single entry, as opposed to 1000 individual entries. EDR was first deployed in the Northeast Region as part of the NPAC 3.0 software release. Recently, the NPAC experienced its first and only outage in the Northeast Region. Because 3.0 was associated with the first use of EDR, some carriers mistakenly assumed that EDR caused the outage. In fact, the outage was due to a problem in the software program completely unrelated to the EDR functionalities. NeuStar diligently worked with its software vendor, isolated and corrected the problem, and quickly returned the Northeast region to full operability. The isolated event does not impact the ability of 3.1 or EDR to support number portability. Further, this isolated incident does not reflect on the ability of NeuStar to meet its regulatory obligations.

Preparation for Pooling and Porting: Opening Area Codes in Advance of November 24, 2002

Commenters expressed concerns that a “flash-cut” implementation of wireless pooling and porting on the same day would place too great a strain on both the NPAC and the carrier networks.⁴ The implementation of pooling and porting is not necessarily a flash-cut process. A majority of the NPAC related procedures can and should be tested, performed, and completed well before the FCC mandated deadline. NeuStar has been working with the industry to develop methods that will allow carriers to spread over several months, the tasks and resources needed to implement pooling and porting. At the October Wireless Number Portability Operations Task Force meeting, NeuStar and industry participants discussed porting and pooling implementation strategies that would

⁴ AWS Comments at 10.

give the industry a head start.⁵ Industry members agreed to consider opening their NXXs in the NPAC over the next few months with an associated effective date of November 24, 2002. With this technique, NXXs will be entered into the NPAC as if they are portable, but the NPAC would not allow numbers in the NXXs to be ported prior to the effective date. At least one major wireless carrier already is employing this strategy. Just as NeuStar assists the wireline industry in its ongoing implementation of wireline number portability by opening NXXs early, NeuStar is providing similar support to wireless carriers as they take the steps necessary to meet the Commission's deadline. By opening NXX's in the months preceding November 24, 2002, wireless carriers, like the wireline carriers before them, would take important steps to meeting the Commission's deadline.

Preparation for Pooling and Porting: Native Block Pooling

At the Wireless Number Pooling Task Force Meeting held October 9 and 10, NeuStar introduced the idea of Native Block Pooling.⁶ A technique first developed for wireline pooling, Native Block Pooling is a method that would allow wireless carriers to ease into pooling by participating initially on paper only. With Native Block Pooling, wireless providers would submit their uncontaminated thousands blocks to the pool and, when a carrier needed additional numbering resources, that carrier would receive one of its previously donated blocks. No intercarrier porting is involved; each carrier would donate and receive blocks from its own private pool. Pursuant to this proposal, presented to the North American Numbering Council (NANC) by the industry on October 16, 2001, wireless carriers could implement Native Block Pooling before the end of 2001 in order

⁵ Upon completion, the meeting minutes will be posted on the NPAC website at www.npac.org.

to ramp up their systems, both internal and external, for the November 24, 2002 deadline.⁷

Native Block Pooling has the added advantage of giving carriers an opportunity to train personnel to submit the proper paperwork to the Pooling Administrator and become accustomed to complying with relevant FCC rules and industry guidelines well before the deadline. In addition, wireless service providers would become familiar with the timing of applications and receipt of blocks. Native Block Pooling would simulate national number pooling in preparation for the November 2002 deadline. Once wireless service providers begin supporting pooling comparable to that presently being implemented in the wireline environment, all blocks contained in the wireless private pools would be integrated into the existing wireline pool of thousand blocks. Regular pooling may begin, with no procedural impact to the wireless carriers, as they simply would continue to submit the same forms to the Pooling Administrator and receive blocks. The only difference between Native Block Pooling and live pooling is that the pooled blocks come from the general pool, as opposed to the carrier's own private pool.

Native Block Pooling also would provide wireless carriers with the opportunity to perform a version of "catch up" in states that already employ pooling. Wireless carriers could partially participate (on paper) in the March 2002 roll out of the national pooling program, up to the point of actually receiving blocks from other carriers. As a result, on November 24, 2002, participating providers immediately would be able to implement "true" pooling in approximately 152 area codes. By implementing Native Block Pooling, the industry would be able to take advantage of the months prior to

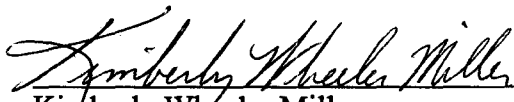
⁶ Upon completion, the meeting minutes will be posted on the NPAC website at www.npac.org.

November 24, 2002 to complete the complex tasks associated with forecasting and donating, become accustomed to pooling procedures, complete the associated paperwork, and train personnel.

Conclusion

The NPAC will be ready to implement wireless pooling and porting by November 24, 2002, as required by the Commission's rules. NeuStar will finalize the installation and testing of NPAC hardware and software upgrades by May of 2002. Carriers will have ample time to complete all NPAC testing prior to the deadline. With the addition of Native Block Pooling and advance opening of NXX codes in the NPAC, carriers can begin modifying their systems immediately to accommodate pooling and porting and to train staff in the procedures associated with pooling and porting. These innovative tools will help ease carriers into the process and help ensure the smooth and timely transition to wireless pooling and porting.

Respectfully submitted,


Kimberly Wheeler Miller
Regulatory Policy Counsel

NeuStar, Inc.
1120 Vermont Avenue, N.W., Suite 400
Washington, D.C. 20005
(202) 533-2912
(202) 533-2972

⁷ Upon completion, the meeting minutes will be posted on the NPAC website at www.npac.org.

CERTIFICATE OF SERVICE

I, Kimberly Wheeler Miller, do hereby certify that on this 22nd day of October, 2001, copies of the foregoing Reply Comments were served by U.S. first class mail, postage prepaid to the following:

James B. Ramsey
National Ass'n of Reg. Utility Comm'rs
1101 Vermont Ave., N.W., Suite 200
Washington, DC 20005

Gregg Faber
Vermont Public Service Board
Drawer 20
Montpelier, VT 05620-2701

Lawrence G. Malone
New York Public Service Commission
Three Empire State Plaza
Albany, NY 12223-1350

Barclay Jackson
New Hampshire PUC
8 Old Suncook Road
Concord, NH 03301

Max Yzaguirre, Chairman
Texas Public Utility Commission
1701 North Congress Avenue
Austin, TX 78711

Donald W. Downes, Chairman
Connecticut Dept. Public Util. Control
Ten Franklin Square
New Britain, CT 06051

Jennifer M. Granholm
Michigan Public Service Commission
P.O. Box 30221
Lansing, MI 48909

Jodi J. Bair
Ohio Public Utilities Commission
180 East Broad Street
Columbus, OH 43215-3793

Talley Frenkel
WorldCom
1133 - 19th Street, N.W.
Washington, DC 20036

Charles C. Hunter
Hunter Communications Law Group
1424 - 16th Street, N.W., Suite 105
Washington, DC 20036

John Goodman
Verizon
1300 Eye Street, N.W.
Washington, DC 20005

John T. Scott
Verizon Wireless
1300 Eye Street, N.W., Suite 400 West
Washington, DC 20005

Ronald L. Ripley
Dobson Communications Corp.
14201 Wireless Way
Oklahoma City, OK 73134

Glenn S. Rabin
ALLTEL Communications
601 Pennsylvania Ave., N.W., Suite 720
Washington, DC 20004

J.R. Carbonell
Cingular Wireless
5565 Glenridge Connector, Suite 1700
Atlanta, GA 30342

Douglas Brandon
AT&T Wireless Services
1150 Connecticut Ave., N.W., 4th Floor
Washington, DC 20036

Sylvia Lesse
Kraskin, Lesse & Cosson
2120 L Street, N.W., Suite 520
Washington, DC 20037

Brian O'Connor
VoiceStream Wireless
401 - 9th Street, N.W., Suite 550
Washington, DC 20004

Michael F. Altschul
Cellular Telecom. & Internet Ass'n
1250 Connecticut Ave., N.W., Suite 800
Washington, DC 20036

Eva Marie Wohn
U.S. Cellar Corp.
8401 West Bryn Mawr Ave., Suite 700
Chicago, IL 60631-3486

Luisa L. Lancetti
Sprint PCS
401 - 9th Street, N.W., Suite 400
Washington, DC 20004

Joseph Assenzo
Scott Freiermuth
Sprint PCS
6160 Sprint Parkway
Mail Stop: KSOPHIO414-4A325
Overland Park, KS 66251

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 - 12th Street, S.W., Room TW-A325
Washington, DC 20554

Mr. Patrick E. Forster
Wireless Telecommunications Bureau
Policy Division
Federal Communications Commission
445 - 12th Street, S.W., Suite 3-C207
Washington, DC 20554

Ms. Cheryl Callahan
Federal Communications Commission
Common Carrier Bureau
Network Services Division
445 - 12th Street, S.W., Suite 6-A207
Washington, DC 20554

Mr. Joseph Levin
Federal Communications Commission
Wireless Telecommunications Bureau
Policy Division
445 - 12th Street, S.W., Third Floor
Washington, DC 20554

Ms. Pam Slipakoff
Federal Communications Commission
Common Carrier Bureau
Network Services Division
445 - 12th Street, S.W., Suite 6-A207
Washington, DC 20554

Mr. Jared Carlson
Federal Communications Commission
Wireless Telecommunications Bureau
Policy Division
445 - 12th Street, S.W., Third Floor
Washington, DC 20554

Ms. Kris Monteith
Federal Communications Commission
Wireless Telecommunications Bureau
Policy Division
445 - 12th Street, S.W. Third Floor
Washington, DC 20554

Ms. Jennifer Salhus
Federal Communications Commission
Wireless Telecommunications Bureau
Policy Division
445 - 12th Street, S.W., Third Floor
Washington, DC 20554


Kimberly Wheeler Miller